

# THE BANKERS' BANK COUNCIL

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**Bankers' Bank**  
Ron Slater, President/CEO  
Madison, WI

November 24, 2009

**VIA EMAIL: [comments@fdic.gov](mailto:comments@fdic.gov)**  
Robert E. Feldman, Executive Secretary  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, N.W.  
Washington, DC 20429

**RE: Proposed Correspondent  
Concentration Risk Guidance**

**VIA EMAIL: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)**  
Jennifer J. Johnson, Secretary  
Board of Governors of the  
Federal Reserve System  
20<sup>th</sup> Street & Constitution Avenue, N.W.  
Washington, DC 20551

**RE: Docket No. OP-1369**

**VIA EMAIL: [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov)**  
Office of the Comptroller of the Currency  
250 East Street, S.W., Mail Stop 2-3  
Washington, DC 20219

**RE: Docket ID OCC-2009-0013**

The Bankers' Bank Council ("BBC") is fully committed to the safe and sound practice of banking, including regulations to the intended effect of measuring, monitoring and controlling correspondent concentration risk. As explained in BBC's previously-submitted comment dated October 26, 2009, incorporated herein by reference, elements in the proposal should be reconsidered, modified and clarified in order to achieve their salutary objectives while minimizing undue hardship and disproportionate burdens for community banks.

Since the date of its original submission, BBC has obtained confirmation that many of its members' respondent community banks view the present wording of the proposed guidance as supplying grounds for field examiners to criticize a respondent's credit exposure near, at, or above 25% of its Tier 1 capital to any correspondent, no matter how well the correspondent is capitalized. Therefore, if the proposed guidance will contain any internal touchstone for correspondent credit exposure other than a reference to Reg. F, our respondent community banks would suggest the threshold is more appropriately set at not less than 50% of Tier 1 capital.

Thank you for your consideration.

Sincerely,

*Don Abernathy, Jr.*

Don Abernathy, Jr., Vice Chairman  
The Bankers' Bank Council